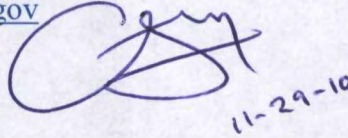


Efficacy Review

Date: November 29, 2010

Efficacy Reviewer: Clayton Myers, Ph.D., Entomologist, RD-IB
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Risk Manager Rev.: BeWanda Alexander

Products: F6129 EW Insecticide

EPA Reg. #: 279-OLGU

A.I.'s: Bifenthrin (0.05%), Zeta-Cypermethrin (0.0125%)

Decision #s: 434237

DP #s: 381704

Submission: R310, New Product, RD Science Review

MRIDs: Cited: 46431203, 46431205, 46371601, 47385708, 47386709, 47385710, 47399101, 45773901, 47361711, 44021901, 44137401, 44137402, 44637901, 44638801, 44671701, 44891901, 44891902, 44891903, 44891904, 44891905, 44891906, 44891907, 44891908, 48103101, 48103102, 48103103

GLP: No

Overall Review of Label Claims and Directions:

Based upon cited efficacy data, 12 month indoor residual efficacy claims are supported for:

1. Ants of all species on non-porous and semi-porous surfaces.
 2. American cockroaches and Oriental cockroaches on non-porous and semi-porous surfaces.
 3. German cockroaches on non-porous surfaces only.
 4. Spiders of all species on non-porous and semi-porous surfaces.
 5. Scorpions of all species on non-porous and semi-porous surfaces.
- NOTE: No indoor residual claims are supported for porous (i.e., wood) surfaces.
-Direct kills claims are acceptable for any of the above listed pests, for which residual control data was found to be acceptable. However, kills claims are not supported for any pests for which adequate acceptable data was not submitted or cited.

Based upon cited efficacy data, outdoor residual efficacy claims are only supported for imported fire ants, for 6 months. All other outdoor residual efficacy claims must be removed from the label. Claims against the listed arthropod eggs are not subject to Agency efficacy review and may be retained.

Line by Line Review of Efficacy Claims and Directions for Use

Kills: Ants (including Carpenter, Foraging Fire Ants, Pharaoh, and Harvester), Bedbugs, Bees, Biting Flies, Centipedes, Chiggers, Cockroaches (including American/Palmetto bug/Water bug, Asian (Oriental) and German), Fleas, Hornets/yellow jackets, House fly, Mosquitoes, Scorpions, Spiders (including Black widow, Brown recluse, Hobo, and Wolf), Termites, Wasps/yellow jackets: Acceptable.

Also Controls Ticks (including ticks that may Transmit Lyme Disease): Unacceptable, as acceptable residual control data was not submitted or cited for ticks.

Also Kills Ticks (including ticks that may Transmit Lyme Disease): Acceptable.

For long-lasting residual control/action leave spray undisturbed. The product will keep on killing for up to 12 months: Acceptable with any of the four listed proposed footnotes for 12 month claims.

“To control Fleas & Ticks [Including ticks that may transmit Lyme Disease]:” Must be changed to “To kill Fleas & Ticks”

12-Month Claims: Acceptable as listed with any of the 4 proposed footnotes. The Agency may decide in the future to call-in additional product performance data for products with residual claims.

6 Month Claims: These claims are acceptable for spiders with the listed disclaimer.

5 Month Claims: These indoor claims are acceptable as listed. The Agency may decide in the future to call-in additional product performance data for products with residual claims.

4 Month Claims: These claims are acceptable for spiders with the listed disclaimer.

3 Month Claims:

-Outdoor claims against spiders (excluding black widow, brown recluse, hobo), and harvester ants are acceptable. Outdoor claims against roaches/palmetto bugs/ water bug, scorpions, and fleas are not acceptable and must be removed from the label.

-Indoor claims against Ants (including Western Harvester), German Cockroaches, and Spiders are, as listed, are acceptable with the listed footnoting` .

Egg Killing Claims: Acceptable

Dual Ingredient Claims: "Quick knockdown" is unacceptable, but remaining claims are acceptable.

General:

Kills on contact! Unacceptable

Kills by contact! Acceptable

Broad-spectrum Acceptable

Southern [Fast Acting] [plus Long Residual] Formula, For Southern Homes [Climates] [Bugs]: Unacceptable, as "southern" is a nebulous, arbitrary term and also constitutes an open-ended efficacy claim implying efficacy against any and all bugs in the south. Furthermore, a claim of special efficacy for southern climates was not supported. All variations of this claim must be removed.

Perimeter Treatment Claims: All acceptable

Kill Claims:

Kills insects, spiders, and Ticks, Kills Roaches, Ants, Fleas, Ticks, Spiders, and other listed insects, Kills Home invading Pests/Insects: Acceptable

Also controls [Kills] Ticks (including ticks that may transmit Lyme Disease Kills claim is acceptable, but controls claim is unacceptable and must be removed from the label.

Provides fast knockdown Unacceptable

Visible activity against listed bugs within minutes Acceptable

Kills hidden bugs Unacceptable, as no data was submitted or cited demonstrating kill of insects in harborage away from the site of application.

Starts killing within minutes, Starts acting within minutes Acceptable

[Formulated to] Kill[s] [Tough] Southern Bugs Unacceptable, as "southern" is a nebulous, arbitrary term and also constitutes an open-ended efficacy claim implying efficacy against any and all bugs in the south. Furthermore, a claim of special efficacy for southern climates was not supported. All variations of this claim must be removed.

Claims Against Garden Pests: All acceptable

Kills bugs inside. Keeps bugs out: Acceptable..

Perimeter/bug barrier claims: Acceptable.

Kills and prevents [listed insects] [inside your home] [outside your home]: Acceptable

Keeps [on] killing with residual action, even after you spray, after spray has dried:
Acceptable

Use in . . . to keep listed bugs [listed insects] from entering your home, to kill listed bugs [listed insects]: Acceptable

Long-lasting control, Long-lasting insect control, Long-lasting residual control:
Acceptable

Kills [two][2] ways [Dual Action]: 1) Kills listed insects fast [by contact] and 2) Keeps killing even after spray has dried: Acceptable

Immediately [quickly] forms [creates] [establishes] a perimeter treatment, a [bug][insect] barrier: "Immediately" is unacceptable, as no data supported immediate efficacy. The remainder of the claim is acceptable.

[Creates] [Establishes] a [bug] [insect] barrier, Create (a) bug barrier(s): Acceptable

Creates a barrier that [will kill] [kills] the bugs you have and prevent[s] new bugs from coming [in] [inside your home] [all season]: Acceptable

Kills the bugs you have and creates a barrier that prevents new bugs from coming inside your home all season: Acceptable.

[New] Barrier Technology keeps bugs out of your home, keeps bugs from coming in, Long lasting Barrier technology: "New" is unacceptable, as the product has been registered for more than 6 months. "Technology" may imply enhanced efficacy, but the decision on this claim is deferred to the RM Reviewer/PM. A simple 'bug barrier' claim would be acceptable.

Guards against bugs so you don't have to, Guards against the bugs you can't (don't) see: Acceptable.

Kills listed home invading insects: Acceptable

Kills ants [and many other listed pests/listed insects!], [and] roaches [and many other listed pests/listed insects!], roaches [and] spiders [and many other listed pests/listed insects!]: Acceptable

Spreading Characteristics: These claims are unacceptable, and must be removed from the label—no data was submitted demonstrating the movement of active ingredient into cracks, crevices, harborage, etc., and efficacy in those areas was not assessed.